Good Evening Ann and Theresa,

OneCare is scheduled to speak before the Committee tomorrow, along with the Green Mountain Care Board (GMCB), regarding the proposed language in S.261 on the inclusion of parent child centers, and regulated child care programs, including those designated as specialized child care providers and the Department of Health's local offices. We are supportive of working with these types of community service providers and fostering collaboration among them. We are concerned, however, that the language, as currently written, is explicitly prescriptive stating that the ACO will engage them as "participating providers." The ACO is legally unable to contract with these community service providers as "participating providers" due to constraints of the ACO payer program terms and agreements. The Payers (Medicare, Medicaid and Blue Cross Blue Shield of Vermont) clearly define "participating providers" in their Payer Program Requirements as providers that provide and bill for medical services, which the community service providers you have included do not. The same restriction applies to community providers like the Area Agencies on Aging. OneCare establishes collaborator agreements with these types of community service providers and would be able to do so with other non-billing community service providers if it was mutually agreeable. The language as proposed would prohibit the GMCB from certifying OneCare as we would no longer meet the requirements of our payer program terms and agreements.

We would like to propose the alternative language below which we feel encompasses the spirit and intent of the proposed language, while keeping it broad enough to not compromise our contracts.

17) For preventing and addressing the impacts of childhood Adversity and to the extent possible the ACO provides connections to existing community services and incentives, such as collaborating on the development of quality outcome measurements for use by primary care providers working with children and families and fostering collaboration among care coordinators; community service providers: and families.

I have connected with Ena Backus at the GMCB, and they support this alternative language.

Vicki apologizes that she is unable to attend tomorrow morning but will be there on behalf of OneCare to help clarify any of the above.

Thank you,
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